

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No.: 22-40 (JRT/LIB)(1)*

UNITED STATES OF AMERICA,

Plaintiff,

VS.

HARSHKUMAR PATEL,

Defendant.

## Defendant Harshkumar Patel's Unopposed Motion to Continue the Sentencing Date

Defendant, HARSHKUMAR PATEL, by and through his attorneys Thomas More Leinenweber and Thomas Plunkett, respectfully requests that this Court vacate the sentencing date of March 31, 2025, and set this matter for a new date and states as follows:

1. On November 22, 2024, after a jury trial, the Defendant was found guilty on charges of conspiring with another to bring aliens to the United States causing serious bodily injury and placing lives in jeopardy, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(iii) (Count I); conspiracy to transport aliens causing serious bodily injury and placing lives in jeopardy, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iii); (Count II); attempted transportation of aliens for purpose of commercial advantage and private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(i), and 1324(a)(1)(B)(iii); (Count III); and aiding and abetting the attempted transportation of aliens for the purpose of commercial advantage and private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and

1324(a)(1)(B)(iii); (Count IV).

2. This Court set the sentencing of the Defendant on March 31, 2025.
3. Undersigned counsel is scheduled to be out of the country from March 20 to April 1, 2025 on a family vacation.
4. By way of this Motion, the defendant respectfully requests that this Court vacate the sentencing date of March 31, 2025, and set a new date.
5. Michael McBride, the Assistant United States Attorney in this matter, kindly has no objection to the defendant's request.
6. Undersigned counsel apologizes for any inconvenience to the Court or to the parties.

WHEREFORE, defendant, Harshkumar Patel , respectfully requests that this Court vacate the sentencing date of March 31, 2025, and set the matter for a new date.

Dated: February 11, 2025

Respectfully submitted,

/s/ Thomas More Leinenweber

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